

1 DAVID H. HARPER (*Pro Hac Vice*)
2 *david.harper@haynesboone.com*
3 JASON P. BLOOM (*Pro Hac Vice*)
4 *jason.bloom@haynesboone.com*
5 **HAYNES AND BOONE, LLP**
6 2801 N Harwood St., Suite 2300
7 Dallas, Texas 75201
8 Telephone: (214) 651-5000
9 Facsimile: (214) 651-5940

10 JASON T. LAO, SBN 288161
11 *jason.lao@haynesboone.com*
12 ANDREA LEVENSON, SBN 32392
13 *andrea.levenson@haynesboone.com*
14 **HAYNES AND BOONE, LLP**
15 600 Anton Boulevard, Suite 700
16 Costa Mesa, California 92626
17 Telephone: (949) 202-3000
18 Facsimile: (949) 202-3001

11 || *Attorneys for Plaintiff
X Corp.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

16 X CORP., a Nevada corporation,
17 Plaintiff,
18 vs.
19 BRIGHT DATA LTD., an Israeli
20 corporation,
Defendant.

| Case No. 3:23-cv-03698-WHA

**JOINT STIPULATION EXTENDING
BRIEFING SCHEDULE FOR
DEFENDANT BRIGHT DATA LTD.'S
MOTION FOR SUMMARY JUDGMENT**

Date: March 14, 2024
Time: 8:00 a.m.
Ctrm: 12, 19th Floor

Hon. William Alsup

1 Pursuant to Local Rule 7-12, Plaintiff X Corp. and Defendant Bright Data Ltd. (“Bright
2 Data”) hereby submit this joint stipulation regarding the briefing schedule for Bright Data’s
3 pending motion for summary judgment (the “Motion” [Dkt. 62]).

4 WHEREAS, on January 17, 2024, Bright Data filed its Motion (Dkt. 62), which noticed a
5 hearing on March 14, 2024;

6 WHEREAS, the current deadline for X Corp.’s Opposition to the Motion is January 31,
7 2024, and current deadline for Bright Data’s Reply is February 7, 2024;

8 WHEREAS, the briefing schedule in connection with the Motion has not previously been
9 extended, and X Corp. has not filed its Opposition to the Motion;

10 WHEREAS, the parties have met and conferred, and agree that in light of X Corp.’s belief
11 that additional time is needed to respond to Bright Data’s Motion, and the fact that a modest
12 expansion of the briefing schedule will not impact the noticed hearing date for the Motion.

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the
14 Court’s approval, that:

- 15 1. The deadline for X Corp.’s opposition to the Motion shall be February 7, 2024;
- 16 2. The deadline for Bright Data’s reply in support of the Motion shall be February 21,
17 2024;
- 18 3. The hearing on the Motion, scheduled for March 14, 2024, shall remain on calendar.

19 Dated: January 24, 2024

20 Respectfully submitted,

21 **HAYNES AND BOONE, LLP**

22 By: /s/Jason T. Lao
23 David H. Harper (*Pro Hac Vice*)
24 david.harper@haynesboone.com
25 Jason P. Bloom (*Pro Hac Vice*)
26 jason.bloom@haynesboone.com
27 2801 N. Harwood St., Suite 2300
28 Dallas, Texas 75201
Telephone: (214) 651.5000

29 Jason T. Lao
jason.lao@haynesboone.com
Andrea Levenson
andrea.levenson@haynesboone.com
600 Anton Boulevard, Suite 700

1 Costa Mesa, California 92626
2 Telephone: (949) 202-3000

3 *Attorneys for Plaintiff X Corp.*

4 **PROSKAUER ROSE LLP**

5 By: /s/David A. Munkittrick
6 Colin R. Kass (*pro hac vice*)
7 Proskauer Rose LLP
8 1001 Pennsylvania Ave., N.W.
9 Washington, D.C. 20004
10 (202) 416-6890
11 ckass@proskauer.com

12 David A. Munkittrick (*pro hac vice*)
13 Proskauer Rose LLP
14 Eleven Times Square
15 New York, New York 10036
16 (212) 969-3000
17 dmunkittrick@proskauer.com

18 *Attorneys for Defendant Bright Data Ltd.*

19
20
21
22
23
24
25
26
27
28

CERTIFICATION

I, Jason T. Lao, am the ECF User whose identification and password are being used to file this JOINT STIPULATION EXTENDING BRIEFING SCHEDULE FOR DEFENDANT BRIGHT DATA LTD.'S MOTION FOR SUMMARY JUDGMENT. In compliance with Civil L.R. 5-1(h)(3), I hereby attest that each other signatory has concurred in this filing.

Date: January 24, 2024

/s/ Jason T. Lao

Jason T. Lao

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, a true and correct copy of the foregoing document was served by filing the same via the Court's CM/ECF system, which will provide notice of the filing of same to all counsel of record.

Date: January 24, 2024

/s/ Jason T. Lao

Jason T. Lao